2:22-cr-00993-RMG

THE DISTRICT COURT OF THE UNITED STATES DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

UNITED STATES OF AMERICA,)
) CASE NUMBER: 2:22-cr-00993-RMG
Plaintiff,)
v.) MOTION TO WITHDRAW AS COUNSEL
)
JONATHAN RAMACI,)
)
Defendant.)

The undersigned counsel for Defendant hereby moves this Honorable Court for an order relieving Jerry N. Theos and E. Gordon Hay, VI of the Theos Law Firm, LLC, and Joseph P. Griffith, Jr. of the Joe Griffith Law Firm, LLC, as counsel for the Defendant.

This motion is being made based upon the following grounds: (1) The Defendant is not capable of making the financial arrangements to retain the representation of the undersigned attorneys; (2) The undersigned attorneys' engagement with the Defendant was effective only through judgment at the district court, and that engagement has now terminated; (3) One or more of the grounds Defendant may raise post-conviction and/or on appeal may require the undersigned counsel to serve as witnesses, thereby precluding the undersigned counsel's continued representation, including the instant appeal; and, (4) The Defendant now wishes to engage the legal services of the Public Defender.

The undersigned counsel has provided written notice of their intent to withdraw as counsel to Defendant and Counsel for the Government. Defendant and the Government consent to the requested relief.

By: Respectfully submitted,

/s/ Jerry N. Theos

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&

/s/ Joseph P. Griffith, Jr.

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